

MLM:JHK:BWB
F.#2006R00688

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

Cr. No. 07-543 (DLI)

RUSSELL DEFREITAS,
also known as "Mohammed,"
KAREEM IBRAHIM,
also known as "Amir Kareem"
and "Winston Kingston,"
ABDUL KADIR,
also known as "Aubrey Michael
Seaforth," and
ABDEL NUR,
also known as "Compton
Eversley,

A F F I D A V I T

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

ROBERT ADDONIZIO, being duly sworn, deposes and states that he is a Detective/Investigator with the Kings County District Attorney's Office assigned to the New York Joint Terrorism Task Force ("JTTF") led by the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such. The source of your deponent's information and the grounds for his belief are as follows:

1. I have been a Detective/Investigator assigned to the JTTF for approximately five years. From 2006 until the present, I have served as a case agent in the matter United

States v. Defreitas, et al., Cr. No. 07-543 (DLI). On January 4, 2010, I submitted an affidavit relating to motions to suppress evidence and sever the trial filed by the four defendants in the Defreitas case (the "first affidavit"). On March 3, 2010, I submitted a second affidavit relating to those motions (the "second affidavit").

2. Before filing the second affidavit, I consulted with the other JTTF case agents assigned to the Defreitas case, the FBI's Assistant Legal Attachés assigned to the country of Guyana in June 2007, the attorney at the Office of International Affairs of the Department of Justice assigned to the country of Guyana in June 2007, and the United States Ambassador to Guyana in June 2007.

3. As set forth in the first and second affidavits, Guyanese law enforcement executed a warrant, issued under Guyanese law, to search the residence of Russell Defreitas in Guyana on June 6, 2007. Based on my personal knowledge, as well as the consultations identified above, I can assure the Court that the United States government did not request that the government of Guyana conduct that search, and that the government of Guyana did not seek the approval of the United States government prior to the search. As set forth in my prior

affidavits, United States government agents also did not participate in that search.

Dated: March 17, 2010
Brooklyn, New York



ROBERT ADDONIZIO
Detective/Investigator
Joint Terrorism Task Force